

EC

AO 91 (Rev. 11/11) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Southern District of Ohio

United States of America

v.

Lucas Allen Pullins
7265 Mallard Drive
Dublin, Ohio 43016

Case No. 2:24-mj-374

Defendant(s)

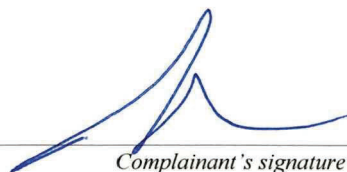
CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of July 2020 - November 2024 in the county of Franklin in the
Southern District of Ohio, the defendant(s) violated:*Code Section**Offense Description*18 U.S.C. § 2251
18 U.S.C. §§ 2252, 2252ASexual Exploitation of a Minor
Distribution, Receipt, and Possession of Child Pornography.

This criminal complaint is based on these facts:

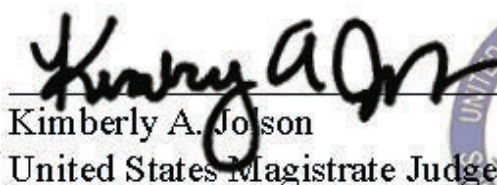
See the attached Affidavit of FBI Special Agent Josh Saltar, which is fully incorporated herein.

☒ Continued on the attached sheet.*Complainant's signature*

Josh Saltar, FBI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: August 5, 2024City and state: Columbus, Ohio
Kimberly A. Tolson
United States Magistrate Judge

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

In the matter of:

United States of America

v.

Lucas Allen Pullins

7265 Mallard Drive

Dublin, Ohio 43016

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Case No.: 2:24-mj-374

Magistrate Judge:

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Josh Saltar (Your Affiant), a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I am a Special Agent (SA) with the Federal Bureau of Investigations (FBI) and have been since October 2014. I am currently assigned to the Child Exploitation and Human Trafficking Task Force, Cincinnati Division, Columbus Resident Agency. I am primarily responsible for investigating internet crimes against children, including child pornography offenses and the online exploitation of children. During my career as a SA, I have participated in various investigations involving computer-related offenses and have executed numerous search warrants, including those involving searches and seizures of computers, digital media, software, and electronically stored information. I have worked with multiple international law enforcement agencies around the world, focusing on cyber-terrorism and terrorist financing through computer intrusions. I have also assisted on various cases and violations, ranging from violent crimes against children and white collar to healthcare fraud, counterintelligence, and counterterrorism. As part of my duties as a Special Agent, I investigate criminal violations relating to child exploitation and child pornography violations, including the illegal production, distribution, transmission, receipt, and possession of child pornography, in violation of 18 U.S.C. §§ 2251, 2252, and 2252A. I have reviewed numerous examples of child pornography (as defined in 18 U.S.C. § 2256) in all forms of media, including computer media. Prior to joining the FBI, I spent four years working as a civilian Intelligence Specialist for the U.S. Air Force at the National Air and Space Intelligence Center located at the Wright-Patterson Air Force Base, under both the cyber and counterspace squadrons, performing classified intel and reverse engineering duties. During my employment, I have received numerous forensic trainings with the both the Department of Defense and Department of Justice, as well as from private sector security conferences. I have received multiple certifications in Windows, mobile, and memory forensics, as well as incident response and penetration testing, and am certified by the Department of Justice as a Digital Extraction Technician. I received my B.A. from Anderson University in computer science, with a focus on programming, artificial intelligence, and machine learning. As a SA with the FBI, I am authorized to

investigate violations of the laws of the United States and to execute warrants issued under the authority of the United States.

2. I, Special Agent Josh Saltar (your affiant), make this affidavit in support of a criminal complaint to arrest for violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) – production of, advertising/solicitation for/or, and distribution and receipt of visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”), distribution, transmission, receipt, and/or possession of child pornography, as well as and the coercion or enticement of a minor(s). Since this affidavit is being submitted for the limited purpose of securing a criminal complaint and arrest warrant, your affiant did not include each and every fact known concerning this investigation. Your affiant did not withhold any information or evidence that would negate probable cause. Your affiant set forth only the facts that are believed to be necessary to establish probable cause that Lucas Allen Pullins (PULLINS) committed the violations listed above.

FACTS SUPPORTING PROBABLE CAUSE

3. On or about June 8, 2023, an FBI Special Agent (SA) out of the Sacramento (CA) Field Office was working in an undercover capacity (OCE) attempting to identify subjects involved in the online sexual exploitation of a children via the Kik application. On that date, the OCE observed a participant with the Kik username “iloveitqlldaddi,” who was later identified as Lucas PULLINS, post five videos to a Kik group. The videos depicted a young pubescent female, herein after Minor Victim One (MV1) masturbating with a sexual device. The following conversation between PULLINS and another Kik user (herein after referred to as K2), was observed by the OCE after PULLINS posted the aforementioned videos of MV1:

K2: Omg age
K2: Agreed even
PULLINS: She should be 19 now
PULLINS: Idk I don't keep track of her age. I just make sure send me nudes
PULLINS: I met her when she was 14 tho

4. That same day, the OCE messaged PULLINS directly in a private conversation via the Kik application. The following conversation ensued between the OCE and PULLINS between on or about June 8 through June 10, 2023:

OCE: Nice vids id love to know more about how to get girlz to send me those ... Ay tips !
PULLINS: It's actually kind of hard these days but the younger you are the better imo
PULLINS: Like when I was 16 sweet talking these stupid little whores was easy
PULLINS: Now I'm 24 and seen more like a creep
OCE: Haha yeah I guess everything gets harder w age [sad emoji]

OCE: But you posted some pics of a cuite so clearly you still got game !
PULLINS: **U talking about the fat bitch?**
OCE: Yeah
PULLINS: **That's different case I more or less blackmail her**
OCE: Got it, how'd you meet her ? I'd love to learn how to get this little bitches to send me their pics
OCE: She looks like mane she's 14? Love that age
PULLINS: **She's 19 but I met her when she was 14 lol. A lot of stuff happened honestly. I'm not sure her situation could be easily replicated**

5. On or about June 12, 2023, PULLINS posted five additional videos of MV1 masturbating using both her own finger and a sexual device in the same group noted above. The following conversation with two additional Kik users (herein after referred to as K3 and K4) then took place after PULLINS posted the videos of MV1:

PULLINS: **I'm buying her some lube Friday. I can't wait to watch her ass stretch**
K3: Not sure she needs it lol
K3: Mmmm
PULLINS: **She's a cry baby whore**
PULLINS: **"Anal hurts to much without it"**
PULLINS: **So I'm getting the lube and she has to do 5 minutes of anal a day or else I show her family what she does**
K3: Haha
K4: Lol she has a big bum should be able
PULLINS: **Once I got her to send nudes with her face in it. I turned it into black mail [shrugging emoji] should be smarter lol. She's 19 and cares what her family thinks to much**
PULLINS: **Fat bitches got the loosest wholes**
PULLINS: **I keep telling her to just put it in. But I'll be a little nice. She's easier to make do stuff if I'm a little nice**
PULLINS: **If I threaten to show her family all the time she just starts crying. Which like if fine with me I want to hear you cry in the videos tbh but she's a stupid bitch tbh**

6. On July 10, 2023, FBI Sacramento served an administrative subpoena to Kik for the subscriber for Kik username "iloveitqlldaddi." On or about July 11, 2023, Kik responded and provided the IP Address 75.188.48.111 which was resolved to Charter Communications.
7. On July 27, 2023, FBI Sacramento served an administrative subpoena to Charter Communications for the subscriber of the IP Address 75.188.48.111. On August 7, 2023, Charter responded and provided the subscriber address as 7265 Mallard Drive, Dublin, Ohio 43016.

8. On or about August 1, 2023, the OCE was invited to join another private group on Kik in which PULLINS was also a member. Over a period of time spanning from approximately August 1 through August 17, 2023, PULLINS distributed approximately 39 videos of child pornography to the private group. The videos generally depicted young girls, ranging from approximately 4 to 12 years of age, being vaginally and anally penetrated by adult male penises. Additional videos depicted adult females performing oral sex and using sexual devices on minor girls. One video, approximately 25 seconds long, depicted an adult male engaging in vaginal sex with a prepubescent girl, approximately 6-8 years old. The video started with the male laying on top of the girl with his penis inserted into her vagina. The girl then stated, "Stop it! Stop!" and began to start crying. As the male continued to penetrate the girls vagina with his penis, she continued to scream and cry while still saying "stop". At approximately 20 seconds, the male stopped penetrating the minor female and left the video while she continued to cry.
9. On August 8, 2023, FBI Sacramento passed along their investigative reports as well as the chats to FBI Cincinnati's Columbus Child Exploitation and Human Trafficking Task Force (CEHT TF), to which your affiant is assigned.
10. On August 16, 2023, your affiant conducted a search of a law enforcement database for IP Address 75.188.48.111. The database indicated that there were five separate CyberTipline reports related to that IP Address which had been flagged by the National Center for Missing and Exploited Children (NCMEC). Those CyberTipline reports all indicated that a registered Electronic Service Provider (ESP) identified child exploitation material on their respective platforms and reported the child pornography to the NCMEC accordingly and which account the material was found in to NCMEC.
11. In one such report, Google reported that media stored in a Google Drive related to email address eddboiis@gmail.com was flagged as child exploitation material. Google also provided the date of birth for the registered owner of the eddboiis@gmail.com account as June 16, 1990. On September 6, 2023, the CEHT TF served an administrative subpoena to Google for the subscriber of email address eddboiis@gmail.com. On September 7, 2023, Google responded and provided the following information:

Created on:	July 25, 2019
Last Login:	August 13, 2023
Last Login IP:	75.188.48.111
Recovery Email:	lukezyga@yahoo.com
Recovery SMS:	614-969-8689

12. Additionally, Google provided the following Google Pay information linked to the same eddboiis@gmail.com account:

Paypal:	luke.pullins73@gmail.com
Date Added:	November 21, 2021
Billing Name:	Luke No
Billing Address:	7265 Mallard Drive, Dublin, Ohio 43016

Phone Number: 614-969-8689

13. Over a period of time spanning from on or about October 11 through October 15, 2023, PULLINS distributed approximately 106 videos of child pornography to the private Kik group. The videos generally depicted young girls and boys, ranging from infants to approximately 15 years old, being vaginally and anally penetrated by adult male penises. Additional videos depicted adult females performing oral sex and engaging in vaginal sex with young pubescent boys. One video, approximately 11 seconds long, depicted an adult male inserting his penis into the anus of an approximately one-year-old boy.
14. Throughout the time frame of October 11 to October 15, 2023, additional Kik users in the private Kik group would also post images and videos of child exploitation material. On or about October 11, 2023 at approximately 11:30PM (UTC), PULLINS asked the group, "Got any yung". Later, in the same chat thread, PULLINS commented, "Someone should really post some yung", and another Kik user then distributed to the group six videos of what reasonably appeared to be child pornography. PULLINS responded by stating, "That second video has me hard as fuck". PULLINS then posted seven videos of child pornography and asked the group, "You got anymore like it?" in reference to what he had just posted. Another Kik user then distributed two videos of what reasonably appeared to be child pornography, to which PULLINS responded, "A little whimpering and that video would have been perfect. I love seeing big dicks fuck littles something's that can really stretch them out I love it" and "Fuck I wish I could dump my load in a little cunt." Later in the private Kik group chat, PULLINS asked the group whether or not "Anyone got anything babyish?".
15. In addition, on or about October 14, 2023, OCE and PULLINS began discussing MV1 again. During that conversation, the OCE asked PULLINS if MV1 was 14 years old in the videos PULLINS had distributed of her. In response, PULLINS stated the following:

PULLINS: No and of the stuff with dildos she's 18+
PULLINS: I don't think I have any nudes of her as a minor. She's a real cunt tbh
PULLINS: Actually I have a few things when she was a minor but not at 14
16. PULLINS then distributed to the OCE approximately 85 images and videos that depicted zoomed in angles of female breasts and a vagina, both clothed and nude. Several images depicted a face of a young girl with different markings, captions, or filters in the images. The face in all the images appeared to be the same person. After distributing these images to the OCE, PULLINS stated the following:

PULLINS: This is all I have pre 18...Most of which she sent to other dudes but I guilted her into give me because we were "dating"
PULLINS: She wants me to come to Texas and fuck her brains out lol

17. On October 27, 2023, after receiving the updated activity from FBI Sacramento, your affiant was assigned the information and opened an investigation.
18. Also on October 27, 2023, your affiant served an administrative subpoena to Google for the subscriber of email address luke.pullins73@gmail.com which was the email address attributed to the Google pay legal process noted above. On October 30, 2023, Google responded and provided the following information:

Created On:	July 5, 2014
Recovery SMS:	614-969-8689
Last Updated Date:	September 11, 2023
Last IP Address:	75.188.48.111

19. Additionally on October 27, 2023, your affiant served an administrative subpoena to AT&T for the subscriber of phone number (614) 969-8689. On October 30, 2023, AT&T responded and provided the subscriber's name as Lucas Pullins and the subscriber address as 7265 Mallard Drive, Dublin, Ohio 43016.
20. On November 15, 2023, a federal search warrant was executed at 7265 Mallard Drive, Dublin, Ohio 43016. Present at that location was PULLINS. Your affiant interviewed PULLINS, and after being advised of his *Miranda* rights, PULLINS waived and informed your affiant that he possessed child pornography on several of his devices, as well as downloaded and shared child pornography on the Kik application on his cell phone. PULLINS went on to inform your affiant that he had a Kik conversation with a "babysitter from California" (OCE), and distributed images and videos of MV1 when she was 17 years old or younger to the OCE. PULLINS stated to your affiant that he found MV1's family members on Facebook and threatened to send child pornography of MV1 to her family members if she did not continue to make and send him explicit images of herself.
21. PULLINS then told your affiant that he had been in communication with a now 20-year-old girl from Ohio, herein after Minor Victim Two (MV2), back before she had obtained the age of 18. PULLINS informed your affiant that MV2 had send him sexually explicit images of herself to him, which he then shared with others.
22. Also, during the search, your affiant recovered multiple electronic devices belonging to PULLINS. Forensic examination of the devices revealed approximately 1,000 images and videos depicting child exploitation material. Those images and videos include media which depicted prepubescent females engaged in nudity, oral sex, anal penetration, masturbation, bondage, or other sexual activity with other adults.
23. Continued examination of the devices revealed the following text conversation between PULLINS and another Kik user, identified to be MV2 on or about July 22, 2020:

PULLINS:	Let me see those panties and talk your shorts all the way off
MV2:	Ugh

PULLINS: Do it
MV2: K whatever
PULLINS: What's with the sas
MV2: I don't have any
PULLINS: Okay
PULLINS: Where's the pic
MV2: Idk
PULLINS: Send it
MV2: Fine

MV2 sent an image which depicted a girl laying down with pink shorts around her ankles and purple underwear, with the focus on the genital area of the female.

PULLINS: Take those panties off
MV2: Ugh
PULLINS: Do it
MV2: Night
PULLINS: The fuck?
MV2: 😊😊
PULLINS: Take those panties off you little whore so I can fuck that pussy up
MV2: There off
PULLINS: Show me

MV2 sent an image which depicted a girl laying down with pink shorts around her ankles and purple underwear around her knees, with pubic hair exposed. In response, PULLINS stated the following:

PULLINS: Take them all the way off
PULLINS: Before daddy has to hurt you 🐼
MV2: Fine
PULLINS: Good girl
PULLINS: Why you being so difficult
MV2: I'm not
PULLINS: Then where is the pic
MV2: It's not working
PULLINS: Take a new one then
MV2: I'm trying
PULLINS: Or send it on Snapchat

MV2 sent an image which depicted a girl's legs in the air with pink shorts and purple underwear around her ankles. The following conversation then ensued:

PULLINS: Why aren't they off and I want to see your pussy
MV2: They r always like that
MV2: U just don't know

PULLINS: Show me that pussy
MV2: It doesn't wasn't it to see u
PULLINS: Okay I guess I can do

Eventually, MV2 sent an image which depicted a zoomed in image of a nude vagina with two fingers spreading it open. In response, PULLINS made numerous additional demands of MV2 to “back the camera up some and take another...send a video of [MV2] rubbing her clit...and insert a hairbrush into her vagina and asshole.” In response to his demands MV2 distributed to PULLINS up-close images of her vagina, anus, and a video of herself inserting a hairbrush into her vagina.

24. Further review of the devices revealed a note that listed the full addresses of MV2 as well as her DOB which indicated she was born in March 2004 making her approximately sixteen years of age at the time she was communicating with PULLINS.
25. Based upon the foregoing, your affiant submits that there is probable cause to believe that Lucas PULLINS has committed the violations of 18 U.S.C. §§ 2251, 2252, 2252A, and 2422(b) – production of, advertising/solicitation for/or, and distribution and receipt of visual depictions of minors engaged in sexually explicit conduct (hereinafter “child pornography”), distribution, transmission, receipt, and/or possession of child pornography, as well as and the coercion or enticement of a minor(s). Therefore, your affiant respectfully requests this court issue a criminal complaint and arrest warrant.

Respectfully submitted,



Josh Saltar
Special Agent
Federal Bureau of Investigation

Subscribed and sworn to before me on August 5, 2024


Kimberly A. Tolson
United States Magistrate Judge

